

Voluntary Report – Voluntary - Public Distribution

Date: April 02, 2024

Report Number: CH2024-0039

Report Name: Overview of Feed and Feed Additives and Pet Food
Regulations for Export to the PRC

Country: China - People's Republic of

Post: Beijing

Report Category: FAIRS Subject Report, Grain and Feed, Trade Policy Monitoring

Prepared By: Erin Covert and FAS China Staff

Approved By: Adam Branson

Report Highlights:

The People's Republic of China's (PRC) reorganized and restructured its food safety regulatory system in 2018-2019, substantially changing registration procedures and import requirements applicable to U.S. exports of feed and feed additives. This report provides an overview of the current regulatory authorities and PRC policies for feed, feed additives, and pet food product registrations and imports into the PRC. Exporters are strongly encouraged to conduct due diligence regarding how to comply with all mandatory requirements for their specific product(s), such as requirements pertaining to labeling, packaging, certifications, and shipping documentation.

Background

In March 2018, the 13th National People's Congress approved a food safety regulatory restructuring project that constituted a complete overhaul of the central government's administration of food safety in China and required a large-scale reshuffling of responsibilities. PRC regulatory reform authorities dissolved the former General Administration of Quality Supervision, Inspection and Quarantine of China (AQSIQ) and transferred its oversight of imports and exports to the General Administration of Customs of the People's Republic of China (GACC), while domestic-focused AQSIQ regulatory functions transferred to the State Administration of Market Regulation (SAMR). GACC now manages and supervises the import and export of feed and feed additives products to the PRC, to include day-to-day oversight of imports and exports, management of overseas facility registrations, maintenance of lists affirming market access for imported products, and promulgation and enforcement of policies related to inspection and quarantine of imported products. The reshuffle also resulted in the PRC Ministry of Agriculture and Rural Affairs (MARA) having the authority to regulate the production and use of safe feed and feed additives products within China, to which end it develops and maintains catalogs of permitted feed ingredients and additives.

Regulators of Feed and Feed Additives in China

There are now two main government authorities responsible for the administration and management of feed and feed additives in China: MARA and GACC. MARA is responsible for regulating feed and feed additive production, licensing, and safe use of feed products in China. It accomplishes these objectives with assessment and approval of new feed ingredients and feed additives permitted for use in China, the management of national catalogs that list permitted feed ingredients and feed additives in the PRC, and the issuance of import registration licenses and exemption letters for companies it deems are not required to obtain an import license. GACC, the critical authority inspecting feed products at the time of import, is responsible for granting market access for MARA-approved feed products that will be imported into China, which it accomplishes by maintaining import and export facility registration lists and closely monitoring import and export activity at ports of entry.

Registration Procedures for Exporting Feed and Feed Additives to China

Exporting feed and feed additives products to China requires advanced registration and approval of both MARA and GACC. First, U.S. companies that plan to export feed and feed additives products to China must ensure before shipping that their products/ingredients are included in MARA's [Feed Additives Catalog](#) or [Feed Ingredients Catalog](#). Products listed in China's feed additives catalog or Part 4 under "Single Feed" of the feed ingredients catalog need also to obtain a MARA import registration license naming each specific product. Feed and feed additives definitions and categories in China often differ from those used in the United States (see [Appendix](#) for the definitions for feed and feed additives products in China). If a company's product or its ingredients are not listed in these catalogs, the company likely must apply for MARA approval and publication in the appropriate catalog before exporting to China. The PRC requires foreign feed companies or exporters that are applying for new feed additives and ingredients to be added to its catalogs or applying for a MARA import registration license to initiate these processes via the company's subsidiary in China or a China-based agent.

Second, the company must register with GACC and ensure its company information and product information appears on the appropriate list that GACC publishes on the Department of Animal and Plant Quarantine (DAPQ) [website](#) (currently). After obtaining a MARA license, the company can contact [USDA AMS](#) for addition to its next submission to GACC, which occurs on a roughly quarterly basis. AMS prepares one list for feed additives and related products, which GACC sorts according to internal criteria and publishes in several separate lists, including a feed additives and premixes list, a natural mineral feed list, a mixed ingredients feed list, a single protein feed list, and a compound feed list. Note that AMS does not register companies with GACC for exporting pet food and pet food ingredients; the USDA Animal Plant Health Inspection Service (APHIS) administers pet food-related registrations.

Applicable Regulations

- *Administrative Measures for Feed and Feed Additives* ([link in Chinese](#)), published by Order No. 609 of China State Council in 2011, last revised in March 2017. Constitutes the general regulation for feed and feed additives produced and sold in China. It outlines procedures for the approval of new feed and feed additives products, procedures and required application materials for obtaining import registration licenses, and facility requirements for domestic production permits in China.
- *Administrative Measures for New Feed and Feed Additives* ([link in Chinese](#)), published as Order No. 4 of MARA in 2012, last revised in 2022. States required materials and procedures to apply for new single feed and new feed additives products.
- *Registration and Management Measures for Imported Feed and Feed Additives* ([link in Chinese](#)), published as Order No. 2 of MARA in 2014 and last revised in November 2017 as Order No. 8 of MARA (see FAS GAIN Report [CH14007](#)). In the 2017 version, Article 4 changed from “the overseas enterprise shall file an application to register feed and feed additives imports through a China-based agent” to “the overseas enterprise shall file an application to register feed and feed additives imports through its branch within China or a China-based agent.” Provides detailed information on how to obtain an import registration license, including clarifications on the types of products that require an import registration license, required materials for the application, and renewal procedures for an import license.
- *Inspection and Quarantine Supervision Management Measures for Imported Feed and Feed Additives* ([link in Chinese](#)), published as Order No. 118 of former AQSIQ¹, with GACC issuing the most recent revision in November 2018. Provides guidance on the import and export of feed and feed additives in China, including facility registration with GACC and quarantine and inspection requirements for imported feed and feed additives products.

MARA Import Registration License Application and Change Procedures

U.S. companies that plan to export feed or feed additives to China for the first time, for products that contain only ingredients already approved for use in China, should apply with MARA to obtain an import registration license. After reviewing the registration application materials, MARA will either provide its recommendations for application revisions, issue a determination of exemption letter (if the

feed ingredients already appear in Part 3 of the [Feed Ingredients Catalog](#)), or issue an import registration license. Please see below for an outline of the import registration license application process.

Application for a New Import Registration License

A non-PRC-based company must submit its application for import registration for feed or feed additives from either its office or subsidiary in China or an agent in China that the company entrusts to apply on its behalf. The application materials must be authentic, complete, and standardized, and must be provided in both Chinese and English, in duplicate. The application submission to MARA must also include product samples.

The application materials include:

- Feed and feed additives import registration application form
- Power of attorney and agency qualification certificate
- Certificate of approval for production and use at the place of production registration materials in other countries and regions other than the place of production, and product promotion and application
- For imported feed: Product name, composition, physical and chemical properties, scope of application, and method of use
- For imported feed additives: Product name, main ingredients, physical and chemical properties, product source, purpose of use, scope of use, and method of use
- Information about the production process, quality standards, testing methods and inspection reports
- Labels, trademarks, and Chinese label styles used in the place of production
- Description of the preservation of the strains used in production of microbial products or fermented products (if applicable)

Renewal of the Import Registration License

Import registration certificates for feed and feed additives are valid for 5 years. Companies that need to continue exporting feed and feed additives to China after the expiration of the period of validity must apply for renewal 6 months before expiration.

When applying for renewal, the following materials shall be submitted:

- Application form for renewal of import registration license
- Copy of the original import registration license
- Power of attorney and qualification certificate of domestic agency
- Certificate of approval for production and use at the place of production
- Quality standards, testing methods, and testing reports
- Samples of labels, trademarks, and Chinese labels used at the place of production

Modification of the Import Registration License

A company with a feed or feed additive import registration license must apply for modification of its registration if changes to any of the following information occurs within the validity period of the import registration certificate:

- Product name in English or Chinese
- Company name
- Manufacturer name
- Production address

When applying for modification, the following materials shall be submitted:

- Application form for modification of import registration license
- Power of attorney and qualification certificate of domestic agency
- Original import registration license
- Modification statement and relevant supporting documents

If any changes made to the production site, quality standards, production technology, and scope of application of the products, a new application for registration shall be filed.

Exporters can check product registration status in MARA's [online database](#) and access information such as the license number, company name, address, product information, and period of validity.

Additionally, according to the law, overseas exporters of the registered products must either set up a sales office in China or entrust a China-based qualified agent to sell the imported feed and feed additives products in China.

MARA Feed Ingredients and Feed Additives Catalogs

MARA develops and maintains the [Feed Ingredients Catalog](#) and [Feed Additives Catalog](#), which include feed and feed additives that can be produced, used, and sold in China. MARA will publish an announcement on [its website](#) each time a new feed ingredient or feed additive is approved for use in China. Generally, the full updated catalogs are being published approximately every two years.

If an exporter plans to sell feed and feed additives that have not previously been used in China but have been approved for production and use by the exporting country, they should work with their branch subsidiary office in China or the China-based agent to apply for a **new registration** to with MARA, and providing the following materials with and products samples:

- Trademarks, labels, and promotional applications,
- Certificates of approval for production and use at the place of production, and registration materials from other countries and regions other than the place of production,
- Main components, physical and chemical properties, development methods, production processes, quality standards, testing methods, testing reports, stability test reports, environmental impact reports, and pollution prevention and control measures,

- The feeding effect, residual digestion dynamics, and toxicological safety evaluation report of the feed and feed additives issued by the testing agency designated by MARA.

Those who apply for import registration of feed additives shall also state the purpose and method of use of the feed additive and provide an analysis and evaluation report on the possible impact of the feed additive residue on human health.

The National Feed Evaluation Committee will review the application and provide recommendations to MARA. The National Feed Evaluation Committee is composed of experts in breeding, feed processing, animal nutrition, toxicology, pharmacology, metabolism, hygiene, chemical synthesis, biotechnology, quality standards, environmental protection, and food safety risk assessment, etc. The review meeting should be attended by more than 9 experts from the Committee, and 1-2 experts from other sources can also be invited as needed. The time for approval of the new feed and feed additives are from 6 months to more than 2 years depending on the materials submitted and the judgement of the experts on the review panels.

When the new feed and feed additives are approved for use in China, it will be added into MARA [Feed Ingredients Catalog](#) or [Feed Additives Catalog](#), with published product standards for production, and usage guidance and requirements.

GACC Grant of Market Access

GACC is responsible for approving market access for feed ingredients and additives to be exported to China that are not listed in the approved categories tables on GACC [Animal and Plant Quarantine Department website](#).

Table 1 shows the U.S. feed varieties approved for export to China.

**Table 1: U.S. Feed Categories Approved for Export to China
(updated September 30, 2023)**

Administration	Product	Status
Under Management of Animal Division of GACC	Dairy feed product	Approved. Complete facility registration gradually
	Pet food	Approved imports from the registered facility (list)
	Non-ruminant feed ingredients & fat	Approved imports from the registered facility (list)
	Processed aquatic animal protein (fat)	Approved imports from the registered facility (list)
	Brine shrimp eggs and larva	Approved. Complete facility registration gradually
	Compound feed	Approved imports from the registered facility (list)
	Single cell protein feed	Approved imports from the registered facility (list)
	Natural minerals	Approved imports from the registered facility (list)
	Mixed ingredients feed	Approved imports from the registered facility (list)
	Feed additives and premixes	Approved imports from the registered facility (list)
Under Management of Plant Division of GACC	Rice bran	Approved imports from the registered facility (list)
	Distiller's grains	
	Sugar beet meal	
	Almond shell pellets	
	Oncoprotein	
	Alfalfa grass	
	Timothy grass	

GACC Facility Registration

GACC is the competent authority in China responsible for inspection and quarantine of imported feed products and is also responsible for overseas facility registration for imported feed and feed additives. Facilities in the United States wishing to export feed and feed additives products to China should follow the below steps for facility registration with GACC. GACC maintains its website on monthly basis, U.S. exporters should work with their Chinese importers to make sure the facility and product information is accurately included in GACC Animal and Plant Quarantine Department's [facility listing](#).

- Apply for an import product registration license or product waiver from MARA through a China-based agent. Under MARA regulations, feed products and additives requiring a MARA import product registration license include pre-mixed, compound feed, concentrated feed,

supplementary feed, single feed ingredients, and feed additives. Registration information can be found on [MARA's website](#).

- Ensure your manufacturing facility is registered with FDA. New facilities can begin the registration process [here](#).
- The manufacturing facilities contact [USDA AMS](#) to obtain GACC facility registration information. To obtain export certificates such as Certificate of Free Sale (COFS) and Certificate of Exportability (COE), please visit the FDA Center for Veterinary Medicine (CVM) [Export Certification Application & Tracking system](#) (CVM eCATS).
- USDA AMS works with FAS to register manufacturing facilities with GACC. China only allows imports of feed and feed additives from registered foreign facilities. To register, a facility must comply with the domestic laws, regulations, and standards, which must have the equivalent effect as the PRC regulations and standards. Decree 118 also sets record filing requirements for China's importers, labeling, and feed exports.

Check that registration is complete before shipment. Make sure the feed products and additives are in the MARA's [Feed Ingredient Catalog](#) and [Feed Additive Catalog](#). If a product is not in these catalogues, the manufacturing facilities must complete [MARA's approval process for new feed or feed additives](#) or receive a product waiver.

The U.S. Department of Agriculture (USDA) Animal and Plant Health Service (APHIS) handles issues related to animal and plant health, including issuance of sanitary and phytosanitary certificates. Please visit [APHIS website](#) or contact [APHIS Veterinary Service Center](#) for more information.

The main regulations governing the import and export of feed and feed additives in China include [Entry and Exit Animal and Plant Quarantine Law](#) (link in Chinese) and [Implementation Regulations for Entry and Exit Animal and Plant Quarantine Law](#) (link in Chinese). Please refer to feed and feed additives section in FAS GAIN report [CH2023-0044](#) for more information and overall instructions for registrations with Chinese authorities.

Labeling Requirements

China requires that labels in Chinese need to be attached to the packaging of feed and feed additives products. The label shall indicate the name of the product, raw material composition, guaranteed value of product component analysis, net weight or net content, storage conditions, instructions for use, precautions, production date, shelf life, name and address of the manufacturer, license certificate number, and product quality standards, etc. For the addition of medicinal feed additives, the words "addition of medicinal feed additives" shall also be marked, and its common name, content, and drug withdrawal period shall be indicated. Feeds of animal origin other than milk and dairy products shall also be marked with the words "this product shall not be fed to ruminant animals".

National Standards

Feed and feed additives products manufactured, sold, and used in China need to follow the National Standards for feed and feed additives products for sanitation, labeling, and residues limits. Here are some key mandatory national standards:

- [GB10648](#) National Standard for Feed Label Requirements regulate basic principles, contents, and requirements for feed, feed additives, and feed ingredients (including imported feed products).
- [GB13078](#) National Standard for Feed Sanitation Requirements regulate the limits for residue of toxic or harmful substances and microorganisms, and hygiene requirements for feed ingredients and products.

Pet Food Regulations and Standards in China

Pet food regulations and standards are relatively new in China. Pet food regulation sometimes uses measures and standards that overlap with those used for feed and feed additives products. Standards and measures specifically designed for pet food have been developed based on increasing demands from industry and exponential growth of pet food markets in China.

The key pet food regulations in China currently include:

- Management Measures for Pet Feed,
- Labeling Requirements for Pet Feed,
- Sanitation Rules for Pet Feed,
- Licensing Conditions for Pet Feed Manufacturers,
- Requirements for Application Materials for Pet Compound Feed Production Licensing,
- Requirements for Application Materials for Pet Additive Premix Feed Production Licensing.

These regulations apply to pet foods for dogs and cats, including compound pet food, pet additive premix food, and other pet food, which were listed under [Order No. 20 of MARA](#) (link in Chinese) published on April 27, 2018.

On April 24, 2022, China's National Feed Industry Standardization Technical Committee issued a notice to collect industry input and suggestions on the establishment or amendment of national pet food standards. The notice covers pet food related national and industry standards such as product standards, production technical requirements, additive and raw material standards, and pet food evaluation and testing methods. Currently, China has established national standards for Complete Dog Food (GB/T 31216-2014) and Complete Cat Food (GB/T 31217-2014), please refer to FAS GAIN Report [CH2022-0063](#) for the full translation of the two standards.

U.S. pet food manufacturing facilities exporting to China must obtain inspection and approval of USDA APHIS Veterinary Services (VS) before exporting pet food products and must maintain this approval annually. After inspection, APHIS VS issues the facility an approval number and shares it with APHIS in Beijing. In turn, the Beijing APHIS office transmits the facility's new approval number to the General

Administration of Customs of China (GACC). After GACC reviews and updates its records, it issues the facility a GACC approval number. Note that any amendments to ingredient species must be approved by APHIS, submitted to GACC, and shown as updated on the GACC website before the facility may ship products.

Please contact the relevant [USDA APHIS Veterinary Service Center](#) for more information on inspection, approval, and ingredient amendment processes.

For requirements procedures for pet food registration for U.S. exporters, please refer to FAS GAIN Report [CH2023-0034](#). For understanding the current pet food markets in China, please refer to FAS GAIN Report [CH2023-0019](#).

Pet Food Labeling

In September 2019, MARA released its [No. 210 Announcement](#) (link in Chinese), stating that after March 1, 2020, all domestically produced or imported pet food shall follow pet food labeling requirements.

PRC labeling regulations provides very detailed requirements for the labeling of pet food, which must include the product name, raw materials, product component analysis guaranteed value, net weight, storage conditions, instructions for use, cautions, production date, shelf life, name and address of the manufacturer, licensing certificate number, and product standard. The labeling regulation has strict requirements for claims about pet food, including claims about ingredients, special features, and functions.

Appendix

Feed and Products Definitions in China

China's Administrative Measures for Feed and Feed Additives¹, issued by the State Council and therefore applicable to all subnational measures, defines feed and feed additives product terms as follows:

Feed refers to industrially processed products for animal consumption, including single feed, additives premixed feed, concentrated feed, compound feed, and concentrate supplements.

Feed Additive refers to a small or trace amount of a substance added to a feed product during processing, production, or use, including nutritional feed additives and general feed additives.

Feed ingredient refers to substances in feed products derived from animals, plants, microorganisms, or minerals, used for processing and producing feed but not classified as feed additives.

Single feed refers to feed derived from one species of animal, plant, microorganism, or mineral for producing feed products.

Additives premixed feed refers to feed mainly composed of two (categories) or more than two (categories) of nutritional feed additives, formulated with a carrier or diluent with a certain proportion, including compound premixed feed, trace element premixed feed, and vitamin premixed feed.

Concentrated feed refers to feed mainly formulated with protein, mineral, and feed additive in a certain proportion.

Compound feed refers to feed formulated with various feed ingredients and feed additives in a certain proportion, according to the nutritional needs of farmed animals.

Concentrate supplement refers to feed formulated with various feed ingredients and feed additives in a certain proportion to supplement the nutrition of herbivores.

Nutritional feed additives refers to a small or trace amount of substances included to supplement the nutritional components of a feed product, including feed-grade amino acids, vitamins, mineral trace elements, enzyme preparations, non-protein nitrogen, etc.

General feed additives refers to a small amount or trace amount of substances mixed to ensure or improve feed quality and increase feed utilization.

¹ These Measures are the main source for the definitions for feed and feed additives products, available for download at [China State Council's website](#).

Pet feed² refers to products that are industrially processed and produced for direct consumption by pets, including pet compound feed, pet additive premixed feed and other pet feed; it is also called pet food.

Pet compound feed refers to feed that is formulated with a variety of feed raw materials and feed additives in a certain proportion to meet the nutritional needs of pets at different life stages or under specified physiological and pathological conditions. It can meet the comprehensive nutritional needs of pets when used alone.

Pet food additives premixed feed refers to feed prepared from nutritional feed additives and carriers or diluents in a certain proportion to meet pets' needs for nutritional additives such as amino acids, vitamins, mineral trace elements, and enzyme preparations.

Other pet feed refers to feed that is formulated with several feed ingredients and feed additives in a certain proportion for the purpose of rewarding pets, interacting with pets, or stimulating pets to chew or bite.

Medicated feed additives refer to premixed substances of veterinary drugs mixed with carriers or diluents for the prevention and treatment of animal diseases. Medicated feed additives should follow and implement the management regulations for veterinary drugs.

Animals refers to domesticated or wild animals, such as livestock, poultry, beasts, snakes, turtles, fish, shrimps, crabs, shellfish, silkworms, bees, etc.

Animal products refers to products that are from animals, unprocessed or processed but may still spread diseases, such as raw hides, wool, meat, organs, oils, animal aquatic products, dairy products, eggs, blood, semen, embryos, bones, hooves, horns, etc.

Plants refers to cultivated plants, wild plants, and their seeds, seedlings, and other propagation materials, etc.

Plant products refers to products that are from plants, unprocessed or processed but may still spread diseases and pests, such as grains, beans, cotton, oil, hemp, tobacco, seeds, dried fruits, fresh fruits, vegetables, raw medicinal materials, wood, feed, etc.

Attachments:

No Attachments.

² Pet food definitions are included in China's Management Measures for Pet Feed, which is available for download under Order No. 20 of MARA on [MARA's website](#).